

EXHIBIT 10

MARTIN A. FEINSTEIN
BARTOLETTI vs. CITIGROUP INC.

December 13, 2012
69-72

<p style="text-align: right;">Page 69</p> <p>1 M. A. FEINSTEIN</p> <p>2 amount of overtime that may have been worked?</p> <p>3 MR. BATTAGLIA: Objection.</p> <p>4 A. Yes.</p> <p>5 Q. And you don't recall -- do you</p> <p>6 recall conveying bonus comp numbers regarding</p> <p>7 Matt Chin or Brittany Sharpton to Tom Green?</p> <p>8 MR. BATTAGLIA: Objection.</p> <p>9 A. No.</p> <p>10 Q. Would there have been a reason for</p> <p>11 you to convey bonus comp to any of the group</p> <p>12 heads?</p> <p>13 MR. BATTAGLIA: Objection.</p> <p>14 A. No.</p> <p>15 Q. Do you play a role in promoting</p> <p>16 analysts and associates?</p> <p>17 A. Not really.</p> <p>18 Q. What do you mean by "not really"?</p> <p>19 A. The product groups request it and</p> <p>20 Frank Chin and David Brownstein decide it,</p> <p>21 these days.</p> <p>22 Q. How about in 2008 and prior?</p> <p>23 A. I'm not sure if it was Frank Chin</p> <p>24 and David Brownstein, or just Frank Chin.</p> <p>25 Q. Do you play any role?</p>	<p style="text-align: right;">Page 71</p> <p>1 M. A. FEINSTEIN</p> <p>2 in the process?</p> <p>3 A. It depends upon the situation.</p> <p>4 Q. Give me an example of a situation</p> <p>5 in which you are involved in the process.</p> <p>6 MR. BATTAGLIA: Other than</p> <p>7 analysts and associates in his group?</p> <p>8 MR. DATOO: Yes.</p> <p>9 A. When there was a RIF and managers</p> <p>10 weren't around, I was asked to do that.</p> <p>11 Q. Asked to do what?</p> <p>12 A. To tell them they were being asked</p> <p>13 to leave.</p> <p>14 Q. Do you participate in the</p> <p>15 decision-making process for termination?</p> <p>16 A. No.</p> <p>17 Q. And these are all questions that</p> <p>18 don't involve analysts or associates in your</p> <p>19 group.</p> <p>20 A. Yes.</p> <p>21 Q. So you don't participate in</p> <p>22 determining who gets fired?</p> <p>23 A. No.</p> <p>24 Q. No one asks you for your opinion?</p> <p>25 A. No. I wish, but, no. I have it</p>
<p style="text-align: right;">Page 70</p> <p>1 M. A. FEINSTEIN</p> <p>2 A. Only in the analysts that work for</p> <p>3 me directly, my product group.</p> <p>4 Q. Would you be copied on e-mails --</p> <p>5 A. Sure.</p> <p>6 Q. -- for promotions.</p> <p>7 Why is that?</p> <p>8 A. The analyst program is a two-year</p> <p>9 program for option for a third year, and then</p> <p>10 after a third year, people can potentially be</p> <p>11 promoted. I typically send out e-mails to the</p> <p>12 product group managers and the coordinators to</p> <p>13 tell them that they have an analyst that is</p> <p>14 potentially up for promotion and should they</p> <p>15 be promoted.</p> <p>16 Q. So is it fair to say that you just</p> <p>17 kind of facilitate --</p> <p>18 A. Yes.</p> <p>19 Q. -- the process?</p> <p>20 A. Yes.</p> <p>21 Q. Do you play a role in firing</p> <p>22 analysts and associates?</p> <p>23 A. Clarify that.</p> <p>24 Q. Are you involved, if an associate</p> <p>25 or analyst is terminated, do you play a role</p>	<p style="text-align: right;">Page 72</p> <p>1 M. A. FEINSTEIN</p> <p>2 on the list.</p> <p>3 Q. Do you know who Mike Murad is?</p> <p>4 A. Mike Murad?</p> <p>5 Q. Yes.</p> <p>6 A. No.</p> <p>7 Q. Do you know if there was a Mike</p> <p>8 Murad -- I don't know if I'm pronouncing his</p> <p>9 name right, M-U-R-A-D; do you know if there</p> <p>10 was a Mike Murad in the housing group in 2008?</p> <p>11 MR. BATTAGLIA: Objection.</p> <p>12 A. Can I see the spelling of his</p> <p>13 name?</p> <p>14 MR. BATTAGLIA: M-U-R-A-D. You</p> <p>15 can write it down.</p> <p>16 A. Mike?</p> <p>17 Q. Mike.</p> <p>18 A. I don't recall. I don't recall.</p> <p>19 Q. Do you know who Amy Bartoletti is?</p> <p>20 A. Yes.</p> <p>21 Q. Did you ever have a conversation</p> <p>22 with Amy Bartoletti in which she mentioned</p> <p>23 Mike Murad's name?</p> <p>24 MR. BATTAGLIA: Objection.</p> <p>25 A. I don't recall.</p>

MARTIN A. FEINSTEIN
BARTOLETTI vs. CITIGROUP INC.

December 13, 2012
97-100

<p style="text-align: right;">Page 97</p> <p>1 M. A. FEINSTEIN</p> <p>2 A. That time period, yes. I don't</p> <p>3 know the exact day.</p> <p>4 Q. Do you know why she was laid off?</p> <p>5 A. I do not.</p> <p>6 Q. Did you ever know why she was laid</p> <p>7 off?</p> <p>8 MR. BATTAGLIA: Objection.</p> <p>9 Q. In 2008, did you ever know why she</p> <p>10 was laid off?</p> <p>11 A. I don't recall.</p> <p>12 Q. So you don't know why she was</p> <p>13 selected and others weren't in her group?</p> <p>14 A. No.</p> <p>15 Q. Did Chia ever tell you that she</p> <p>16 wasn't happy in the housing group?</p> <p>17 A. During that conversation I had, it</p> <p>18 sounds like she was unhappy.</p> <p>19 Q. Did she tell you that?</p> <p>20 MR. BATTAGLIA: Objection.</p> <p>21 A. I don't recall the exact wording.</p> <p>22 Q. Did she tell you that she intended</p> <p>23 to leave Citigroup?</p> <p>24 A. I don't remember.</p> <p>25 Q. Did you ever hear that she wanted</p>	<p style="text-align: right;">Page 99</p> <p>1 M. A. FEINSTEIN</p> <p>2 Q. I'm sorry?</p> <p>3 A. I never do. It's sad, but true.</p> <p>4 Q. So other than this communication,</p> <p>5 referring to Plaintiffs' 190 with Mr.</p> <p>6 Brownstein, did you have any other</p> <p>7 communications with Mr. Brownstein about Chia?</p> <p>8 A. I don't recall.</p> <p>9 Q. Were you involved with hiring</p> <p>10 Brittany Sharpton as a summer intern?</p> <p>11 A. I was told to hire her as a summer</p> <p>12 intern.</p> <p>13 Q. Who told you to hire her?</p> <p>14 A. I don't recall.</p> <p>15 Q. Do you know why you were told to</p> <p>16 hire her?</p> <p>17 A. I was told that she knew -- she</p> <p>18 was a child of somebody or something of that</p> <p>19 nature and that we should, for the summer</p> <p>20 program, we should have her come in.</p> <p>21 Q. Is that because she came from a</p> <p>22 prominent family?</p> <p>23 A. I have no idea.</p> <p>24 Q. Does Citi usually --</p> <p>25 A. I don't even know what the</p>
<p style="text-align: right;">Page 98</p> <p>1 M. A. FEINSTEIN</p> <p>2 to leave Citigroup?</p> <p>3 MR. BATTAGLIA: Objection.</p> <p>4 Q. In 2008?</p> <p>5 A. I don't remember.</p> <p>6 Q. Did you ever hear that she wasn't</p> <p>7 happy in the housing group?</p> <p>8 A. She told me.</p> <p>9 Q. Based on --</p> <p>10 A. Based on that e-mail.</p> <p>11 Q. Just turn your attention back to</p> <p>12 that e-mail, Plaintiff's Exhibit 190.</p> <p>13 A. Yes.</p> <p>14 Q. Does it say anywhere in your</p> <p>15 e-mail that she said she was unhappy?</p> <p>16 A. It was in the tone of the</p> <p>17 responses I had. Those are not words from a</p> <p>18 happy person.</p> <p>19 Q. You don't recall her using those</p> <p>20 exact words. Right?</p> <p>21 MR. BATTAGLIA: Objection.</p> <p>22 A. No.</p> <p>23 Q. Did you think she was going to</p> <p>24 leave?</p> <p>25 A. I had no idea. I never do.</p>	<p style="text-align: right;">Page 100</p> <p>1 M. A. FEINSTEIN</p> <p>2 connection is.</p> <p>3 Q. Does Citi usually hire people who</p> <p>4 come from prominent families?</p> <p>5 MR. BATTAGLIA: Objection.</p> <p>6 A. No, it is atypical that we do this</p> <p>7 particular hiring.</p> <p>8 Q. And you don't recall who told you?</p> <p>9 A. I do not.</p> <p>10 Q. Was she qualified to work at Citi</p> <p>11 as a summer intern?</p> <p>12 MR. BATTAGLIA: Objection.</p> <p>13 A. She went to University of</p> <p>14 Pennsylvania. That's all I know of her.</p> <p>15 Q. She went to Wharton, right?</p> <p>16 A. I don't know. I just know she</p> <p>17 went to University of Pennsylvania.</p> <p>18 Q. Is that a good thing?</p> <p>19 A. It's a good school.</p> <p>20 Q. If she went to Wharton, that's a</p> <p>21 good thing. Right?</p> <p>22 A. To me? It makes no difference to</p> <p>23 me.</p> <p>24 Q. As to what school you go to?</p> <p>25 A. No. We hire from all different</p>

MARTIN A. FEINSTEIN
BARTOLETTI vs. CITIGROUP INC.

December 13, 2012
101-104

Page 101

1 M. A. FEINSTEIN
2 schools.
3 Q. So you don't know if she was
4 qualified to work as a summer intern?
5 A. No, I don't recall.
6 Q. But Citi wouldn't have hired
7 someone who is not qualified to work as a
8 summer intern. Right?
9 MR. BATTAGLIA: Objection.
10 A. It depends. In theory they would.
11 If I was asked to hire somebody, then whoever
12 made that decision had their reasons.
13 Q. Is there a document that would
14 reflect who asked you to hire Brittany?
15 A. I have no idea.
16 Q. Brittany was hired back as an
17 analyst. Right?
18 A. Yes. She was an analyst.
19 Q. Well, in the summer program --
20 A. It is a summer analyst or a
21 regular analyst. Which one?
22 Q. A summer analyst.
23 A. Okay.
24 Q. So all the questions I just asked
25 you was summer analyst.

Page 102

1 M. A. FEINSTEIN
2 A. Yes.
3 MR. BATTAGLIA: Also known as a
4 summer intern, right?
5 A. Summer intern, summer analyst.
6 MR. DATOO: Attorneys have been
7 using that term.
8 THE WITNESS: Okay.
9 Q. I was just led into that
10 terminology. Hopefully it is accurate. Are
11 they also known as summer interns in Citi?
12 A. Yes.
13 Q. She was hired back as a regular
14 analyst. Correct?
15 A. That is correct.
16 Q. Why was she hired back as a
17 regular analyst?
18 A. Because I was told to hire her as
19 a regular analyst.
20 Q. Do you recall who told you that?
21 A. I don't recall exactly.
22 Q. Was she qualified to work as a
23 regular analyst?
24 A. Not based on her summer
25 performance.

Page 103

1 M. A. FEINSTEIN
2 Q. Was her summer performance
3 evaluated?
4 A. Yes.
5 Q. And was there a written
6 evaluation?
7 A. I do not do a summer review, so
8 I'm not positive exactly how the summer review
9 process goes since no summer people report to
10 me directly.
11 Q. Are there summer reviews
12 conducted?
13 MR. BATTAGLIA: Objection.
14 A. Yes.
15 Q. In written form?
16 MR. BATTAGLIA: Objection.
17 A. Yes.
18 ^ MR. DATOO: Request Ms.
19 Sharpton's summer review.
20 Q. Why do you feel that Brittany was
21 not qualified to work as a regular analyst
22 based on her work as a summer intern?
23 A. A member of our staff was pretty
24 adamant at saying she wasn't qualified.
25 Q. Who was that member?

Page 104

1 M. A. FEINSTEIN
2 A. Amy Bartoletti.
3 Q. What did Amy say?
4 A. I don't remember the exact
5 conversations. I just remember the tones.
6 Q. What was Amy's tone?
7 A. She didn't think that she was
8 qualified.
9 Q. To work --
10 A. And we shouldn't hire her.
11 Q. To work in the housing group?
12 A. It was never specifically said
13 housing group that I recall.
14 Q. Brittany was a summer intern in
15 the housing group. Is that right?
16 A. That is correct.
17 Q. And then she was hired as an
18 analyst in the infrastructure group?
19 A. Correct.
20 Q. Who decided to place her in the
21 infrastructure group?
22 A. Probably myself and Ranier
23 Perkins.
24 Q. Why did you decide to place her
25 there?

MARTIN A. FEINSTEIN
BARTOLETTI vs. CITIGROUP INC.

December 13, 2012
105-108

Page 105

1 M. A. FEINSTEIN
2 A. We tried to fit people's skill
3 sets with what the groups needed.
4 Q. And that was a match with respect
5 to Brittany's skill sets and the
6 infrastructure group?
7 A. The infrastructure group looks for
8 general type people.
9 Q. And why wasn't she a good match
10 for the housing group?
11 MR. BATTAGLIA: Objection.
12 A. From what I understand, her
13 technical skills were weak and so we didn't
14 want to put her in a situation where she would
15 fail.
16 Q. So her quant skills?
17 A. Quant skills.
18 Q. Quantitative skills?
19 A. Whatever, yes.
20 Q. Do you need very strong
21 quantitative skills in the housing group?
22 A. It definitely helps. It's a
23 harder program.
24 Q. And by placing her in the
25 infrastructure group, you felt she could

Page 106

1 M. A. FEINSTEIN
2 succeed there?
3 A. Yes.
4 Q. Because she was strong in other
5 areas?
6 A. She was stronger in other areas.
7 I don't remember her exact strengths and her
8 weaknesses.
9 Q. So do you believe she was
10 qualified to work for Citi in the
11 infrastructure group?
12 MR. BATTAGLIA: Objection.
13 A. She went through the training
14 program. I do not recall how she did on the
15 training program. We do not let people out if
16 they work good during the training program or
17 not, it doesn't matter. They have a two-year
18 contract and we will place them in an area
19 where we hope they will succeed.
20 Q. When you say two-year program,
21 does that mean they are guaranteed to work for
22 two years?
23 MR. BATTAGLIA: Objection.
24 A. Actually, no, because it is an
25 employment-at-will.

Page 107

1 M. A. FEINSTEIN
2 Q. So she could have been fired at
3 any time. Correct?
4 A. Yes.
5 Q. And would she have been fired if
6 her performance was weak?
7 A. We try not to fire our analysts.
8 Q. Now, as an analyst, are you
9 familiar with her work performance?
10 A. She never did anything for me.
11 Q. So you don't have any personal
12 knowledge of her work performance?
13 A. Correct.
14 Q. Did you receive positive feedback
15 about her work performance?
16 A. I do not recall.
17 Q. Do you recall evaluating her?
18 A. I must have, but I don't recall
19 it.
20 Q. Were you familiar with Matthew
21 Chin's work performance as an analyst?
22 A. Same position. I do not know
23 personally of his work.
24 Q. Do you recall filling out his
25 evaluation form?

Page 108

1 M. A. FEINSTEIN
2 A. Same thing. I do not recall that.
3 Q. Same questions with Alan Dockeray:
4 Were you familiar with his work performance?
5 A. What time period -- what was Alan
6 Dockeray's title and the time period?
7 Q. I will represent to you that he
8 was an analyst in 2008.
9 MR. BATTAGLIA: Class of 2008 I
10 believe.
11 A. Class of 2008.
12 So he would have been a first year
13 analyst, 2008.
14 He didn't do anything for me
15 personally. He might have been on the same
16 project with me in another role.
17 Q. Do you recall when that was?
18 A. I don't remember. The project was
19 in New York City. It would be financing.
20 Q. When you say he would have been on
21 a project with you, you mean in another role?
22 A. I do the numbers portion of it.
23 He would be doing the presentations and the
24 writing and the ongoing compliance and all the
25 other things. So he would not have worked

MARTIN A. FEINSTEIN
BARTOLETTI vs. CITIGROUP INC.

December 13, 2012
113-116

Page 113

1 M. A. FEINSTEIN
2 MR. BATTAGLIA: Objection.
3 A. Because -- I just do.
4 Q. And do you recall Matt Chin's
5 reviews being better than Brittany's?
6 A. I don't remember.
7 Q. In 2008, are there groups in the
8 PFD that don't have an analyst at each level?
9 A. You mean --
10 Q. First year, second year, third
11 year?
12 A. Yes.
13 Q. Are those groups?
14 A. In 2008?
15 Q. Yes.
16 A. I don't remember the exact
17 staffing in 2008. If the group doesn't have
18 three analysts or if they have two really good
19 ones, there is no way -- each group staffs
20 themselves differently.
21 Q. Do groups need analysts at each
22 level?
23 A. No.
24 Q. Groups can function without
25 analysts at each level. Right?

Page 114

1 M. A. FEINSTEIN
2 A. Yes. It is not wise, but they
3 can.
4 Q. Why is it not wise?
5 A. Because it is a merry-go-round
6 where after the third year you lose an
7 analyst, if you only have three third-year
8 analysts, they all leave, you have no one to
9 train your new first-year analysts. So if you
10 have one, two, three or something of that
11 nature, as long as you always have a third
12 year when a first year is coming in, you have
13 someone to help train them.
14 You always want to have at least
15 one senior analyst, if you can do it. Some
16 groups don't even have three analysts, and
17 they get caught in this position every year,
18 or every time they need to train new
19 first-year analysts.
20 Q. So your view of Brittany being "at
21 best, a 2 analyst," that is based on feedback
22 you received from bankers in her group?
23 MR. BATTAGLIA: Objection.
24 A. That I recall.
25 Q. Do you recall any positive

Page 115

1 M. A. FEINSTEIN
2 comments about Brittany's work performance?
3 MR. BATTAGLIA: Objection. You
4 may answer.
5 A. No. I don't recall.
6 Q. Do you know if she got along with
7 her co-workers?
8 A. I do not recall -- no, I don't
9 know, actually.
10 Q. Do you know if Matt Chin got along
11 with his co-workers?
12 A. I don't know that either.
13 Q. Did it ever come to your attention
14 that Matt Chin had a loud argument with a
15 co-worker?
16 MR. BATTAGLIA: Objection.
17 A. Yes.
18 Q. How was --
19 A. I recall that.
20 Q. Do you know why that was brought
21 to your attention?
22 A. Probably as the overhead person.
23 Q. And who brought that to your
24 attention?
25 A. I don't recall.

Page 116

1 M. A. FEINSTEIN
2 Q. And do you recall what was said to
3 you?
4 A. No, I do not. I don't even
5 remember why he did it.
6 Q. Do you know who the person was who
7 he had an argument with?
8 A. No.
9 Q. Was it Mathilde McLean?
10 MR. BATTAGLIA: Objection.
11 A. I honestly don't recall.
12 Q. Do you know if he got in an
13 argument with a man or a woman?
14 A. No, I don't.
15 Q. Was Matt Chin counselled or
16 disciplined in any way?
17 MR. BATTAGLIA: Objection.
18 A. Not that I know of.
19 Q. Did you speak with Matt Chin about
20 this?
21 A. I don't recall. It was a one
22 little thing, the best as I recall.
23 Q. But it was big enough to be
24 brought to your attention. Right?
25 MR. BATTAGLIA: Objection.

